

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION

MARY HOLMES, L.V., and EMPOWER  
MISSOURI,

Plaintiffs,

*-against-*

ROBERT KNODELL, in his official capacity  
as Acting Director of the Missouri Department  
of Social Services,

Defendant.

No. 2:22-cv-04026-MDH

**PLAINTIFF'S MOTION FOR  
TEMPORARY RESTRAINING  
ORDER**

**PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER**

Pursuant to Fed. R. Civ. P. 65(b), Plaintiffs move this Court for a temporary restraining order to prevent irreparable harm from befalling Plaintiffs Mary Holmes and L.V. during the pendency of this action. In support of this Motion, Plaintiffs submit their Memorandum in Support of Motion for Temporary Restraining Order, and the declarations and other exhibits filed contemporaneously herewith.

For the reasons set forth in those documents, Plaintiffs respectfully request that this Court grant them the following relief:

1. A Temporary Restraining Order against Defendant Robert Knodell barring him as the Acting Director of the Missouri Department of Social from depriving Plaintiffs Holmes and L.V. of the Supplemental Nutrition Assistance Program ("SNAP") benefits to which they are entitled, and requiring him to provide Plaintiffs with direct access to their

required SNAP interviews within three working days, allow Plaintiffs time to submit such verification as may be necessary to complete the eligibility determination process, and render subsequent eligibility decisions documented on legally sufficient notices consistent with this process; and

2. An Order that no bond or security is required; and
3. An Order granting such other relief as is just and proper.

Dated: St. Louis, Missouri  
February 22, 2022

Respectfully submitted,

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*\*Motion for Pro Hac Vice Admission pending*